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ACCOMPLISHMENT PLAN. REGION VIII. COMPLETION OF STATE IMPLEMENTATION PLAN (SIP) APPROVALS AND ESTABLISHMENT OF COMPLIANCE SCHEDULE

Environmental Protection Agency

5 June 1972

PB 255 264

ENVIRONMENTAL PROTECTION AGENCY

ROCKY MOUNTAIN/PRAIRIE REGION

REGION VIII

COMPLETION OF STATE IMPLEMENTATION PLAN (SIP) APPROVALS AND ESTABLISHMENT OF COMPLIANCE SCHEDULE

JUNE 5, 1972

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USCOMM-DC 8265-P74

ACCOMPLISHMENT PLAN

REGION VIII

Completion of State Implementation Plan
(SIP) Approvals and Establishment
of Compliance Schedule

June 5, 1972

JOHN A. GREEN
REGIONAL ADMINISTRATOR

DAVID D. EMERY
ASSISTANT FOR PLANNING
AND EVALUATION

I. Priority Area Identification

This plan covers the States of Colorado, Montana and Utah, which includes 16 AQCR's, of which 9 are priority I or IA. Table I gives the names of those specific AQCR's and the pollutants of concern.

TABLE I

AQCR's of Priority I or IA

	Part.	SO_x	NO_2	CO	HC-O_x
Colorado					
Pawnee Intrastate (AQCR 1) (northeast)	I				
Metro Denver (AQCR 2)	I			I	I
San Isabel (AQCR 4)	I				
Four Corners (AQCR 6)	IA	IA	IA		
Montana					
Helena Intrastate (AQCR 4)	IA	IA			
Missoula Intrastate (AQCR 1)	I				
Great Falls Intrastate (AQCR 2)		IA			
Utah					
Wasatch Front (SLC - AQCR)	I	I	I	I	I
Four Corners	IA	IA	IA		

II. Problem Assessment

Colorado

Problems encountered may be summarized as follows:

(a) State lacks authority to require owners or operators of stationary sources to install, maintain and use emission monitoring devices, and to make reports on nature and amount of emissions from such stationary sources.

(b) AQCR's 1, 2 and 4 were given an 18-month extension for submission of plans for secondary NAAQS for particulate matter, because achievement of the NAAQS through conventional controls could not be demonstrated.

(c) AQCR 2 was given a 2-year extension for attainment of primary NAAQS for CO and $H_c - O_x$.

The problems stated above have been resolved, through the delegation of legal authority or the granting of extensions to meet the air quality standards, and the plan has therefore been approved. The State has indicated its intent to develop any land use and transportation controls that are necessary to achieve the air quality standards for CO and $H_c - O_x$. They will seek the legal authority in the 1973 legislative session.

Montana

Problems encountered with SIP may be summarized as follows:

(a) Emission limitations cited in the plan are insufficient to attain and maintain national standards for SO_x in AQCR 2 and 4. However, the smelter in AQCR 2 has ceased

operations effective April 1972.

(b) SIP does not allow for disapproval of new sources if it will interfere with the attainment of the national ambient air quality standards.

The deficiencies will be resolved via state revision or EPA promulgation. It is anticipated that the State will eliminate the deficiency listed in item b. EPA will probably have to promulgate SO_x emissions control regulations for the smelters. Existing compliance schedules appear to be adequate upon a cursory review. An in-depth review will be completed by October 1972.

Utah

Problems encountered with State SIP are as follows:

(a) Plan does not provide for emission data to be made available to the public. A small number of sources may be able to prevent release of data due to a confidentiality clause in the Utah regulations. The Governor has indicated his intent to alleviate this loophole with appropriate legislation in 1973. In the interim the EPA will have to be able to provide for the release of the data.

(b) Plan does not provide for adequate control strategy to attain and maintain national standards for SO_x in Wasatch Front Intrastate Region (Salt Lake City) and Utah portion of

Four Corners Intrastate Region.

(c) Part of plan pertaining to particulate emissions from stationary sources is not legallyenforceable.

(d) Plan does not provide for degree of nitrogen oxides emission reduction attainable through application of reasonably available control technology on stationary sources in Wasatch Front Intrastate Region.

(e) Portion of plan concerned with control strategy for sulfur oxides in the Wasatch Front Intrastate Region does not have a legally enforceable compliance schedule.

(f) Plan does not provide for disapproval of construction of a new source or modification of an existing source if it will interfere with attainment of national ambient standards.

(g) Portion of plan concerned with manpower program does not allow for adequate engineering activities.

(h) Wasatch Front Intrastate Region was given a 2-year extension for attainment of primary NAAQS for CO. The State has indicated the intent to seek the legislation and regulation in order to achieve the standards through transportation controls.

The deficiencies will be resolved through plan revision. EPA will be providing the assistance for the State to make these revisions. The State needs to attain legal authority for land use

and transportation controls in the 1973 legislative session. Existing compliance schedules, in some instances, are inadequate and will need revision or promulgation if necessary. A detailed review of additional compliance schedules must be made. Future negotiated compliance schedules must be scrutinized.

III. Specific Agency Objectives

(a) Provide technical assistance to the State in order to acquire adequate revisions or promulgate sections, if required, to alleviate deficiencies in the SIP on July 31, 1972.

(b) The remaining portion of SIP and transportation controls must be submitted by February 15, 1973. Review by EPA will be completed in March 1973.

(c) Approve individually negotiated compliance schedules for primary NAAQS SIP's by March 1973.

(d) Obtain plans from states if not previously submitted for achieving secondary national ambient air quality standards, and approve/disapprove by November 1973.

IV. Approach

The bulk of the work to be performed to assure SIP process completion is covered by PE 245137. A list of the actions involved in the completion of the SIP approvals is summarized in the Accomplishment Schedule.

State of Montana

The SIP does not meet the national primary standards for SO_x. It will probably be necessary for EPA to propose and promulgate regulations for the smelters in order to achieve the sulfur oxide standards. Headquarters personnel are actively involved in this problem providing diffusion modeling and other support as necessary. Assistance will be provided by the Regional Office to the State agency in reviewing emergency episode contingency plans; also, in completing the installation of the air quality surveillance network. Regional Office will continue to assist the State in the review of variance applications.

A major source of particulate emissions in the State is slash burning. The State has requested assistance on the problem from EPA. The U.S. Forest Service will also provide expertise in this area. Headquarters and Regional Office representatives have met with State officials and a plan for attacking the problem will be formulated. A joint task force consisting of the EPA, the U.S. Forest Service, and various State agencies will be formulated within the next six months to study the entire agricultural burning situation. Slash burning must be emphasized because of the magnitude of its impact upon air quality in the Western States. The joint task force position

paper will be issued in order for the States to impose the recommended controls by June 30, 1973.

Potential problems in terms of particulate emissions could accompany the anticipated power plant development in Southeast Montana. The Regional Office and the State agency are following developments in this area.

In view of the limited capabilities of the State source monitoring programs and inadequate Regional Office resources, the monitoring activities during FY 73 and FY 74 can only be accomplished by an EPA contract effort.

Monitoring of approved compliance schedules will be a joint State-Regional Office activity. Individually negotiated compliance schedules or variances will be reviewed by the Regional Office as well as the State.

State of Utah

The SIP does not provide for the attainment of primary standards for sulfur oxides, particulate matter and nitrogen oxides. By July 1, 1972, EPA will propose regulations to insure attainment of these standards. Headquarters is actively involved in diffusion modeling to provide the basis for the Garfield smelter sulfur oxides control regulation and the Huntington Canyon

power plant sulfur oxides control regulation. Process weight, fuel combustion, incinerator, and coke oven particulate control regulations have been developed. A nitrogen oxides control regulation from steam generating plants has been developed. If the State does not provide the required revisions by July 31, 1972, the EPA will be required to promulgate its own regulations in areas not covered by State revisions.

Since the State agency may have problems in releasing emission data, the Regional Office will have to follow this closely to see that the general public has access to this data. If the State agency doesn't make the information available, EPA will be required to do so.

The Headquarters - Regional Office will be providing the State assistance in developing a transportation control plan to reduce emissions of CO and NO_x to meet NAAQS in Salt Lake City area. Recommendations on transportation and land use controls will be presented to the State legislators by January 1, 1973. A plan to show how the CO and NO_x standards will be achieved by 1977 will be submitted by the State by February 15, 1973. It is expected that the enabling authority to adopt land use and transportation control regulations will be granted by the

legislature by July 30, 1973. The proposed State Plan must then be implemented through adopted regulations by December 30, 1973. If at any point in this transportation control development the State fails, the EPA must step in. Although the State Department of Transportation has not been actively involved to date, it is expected to provide assistance to the State agency during the coming year.

A review of the newly submitted emergency episode control plans will be completed in March 1973 by the Regional Office with the assistance from Headquarters-EOCC. If the State Plans are inadequate, the EPA must take the required action. Portions of the existing compliance schedules are inadequate and new compliance schedules will be developed either through State revisions or promulgation as part of the SO_x, NO_2 and particulate matter regulations. This will require substantial effort by the Regional Office. Legal assistance will be provided by HQ-OEGC.

The State does not have adequate procedures to review the impact of new sources. Consequently, unless revisions are made, the Regional Office and Headquarters will be required to utilize diffusion modeling to predict the potential effect on the environment. State agency has allotted insufficient manpower for engineering and enforcement activities.

Ambient air monitoring procedures must be evaluated by the Regional Office since the State uses methods different from those recommended by EPA. If the State does not demonstrate equivalency or change to the recommended methods by July 1974, the Regional Office will have to provide a substantial manpower and funding effort. The Regional Office will provide assistance to the State to develop adequate procedures.

The Four Corners power plant complex (as planned) may cause problems in terms of particulate matter, sulfur oxides and nitrogen oxides. The State agency and RO - HQ will study the possible consequences of the proposed complex further. RO - HQ will also assist the State agency in evaluating the potential particulate emissions from the proposed oil shale development tracts in the Uinta Basin.

State of Colorado

The Regional Office will review the additional portions of the SIP emergency episode plan to be submitted on February 15, 1973, for adequacy. If deemed inadequate, the EPA must promulgate adequate plans. A transportation control plan for the Denver AQCR must be submitted by February 15, 1973. The Regional Office will provide assistance in the development of this plan. It is expected that the enabling authority to adopt land use and

transportation control regulations will be granted by the legislature by July 30, 1973. The proposed State plan must be implemented through adopted regulations by December 30, 1973. If at any point in this transportation control development, the State fails, the EPA must step in.

The State received a two-year extension in achieving the primary standards for O_x, HC and CO. The Regional Office will be working closely with the State agency and will provide assistance as needed to achieve the standards. An 18-month extension was granted the State to achieve the secondary standard for suspended particulates. Although the major point sources will be controlled, it is possible that problems may still exist due to the area source problem. The State agency and the Regional Office will continue to study this problem.

In summary, program element 245137 covers the Regional Office work required to complete the SIP development and approval in the States of Colorado, Montana and Utah.

Sub-element 3A1121 (Stationary Forces Enforcement) covers the work related to approving compliance schedules. Regional Office will assist the states in developing acceptable compliance schedules and will have formal conferences with each State agency. Topics such as: (1) adequacy of legal authority of State agency to grant variance or develop compliance schedule; (2) adequacy of

legal authority to enforce content of the schedules; and (3) the format and content of the compliance agency will be discussed at the conferences. With the exception of Utah, little difficulty is foreseen. For Utah, it may be necessary for the Regional Office to supply considerable manpower and funds to insure that an approvable compliance schedule is forthcoming.

A minor amount of resources will be required from 2A4136 (Air Control Agency Grants) for State assignees who spend part of their time in work related to objectives of the Accomplishment Plan. Montana, Colorado and Utah have 3, 2 and 2 State assignees, respectively. No effort has been made to estimate the portion of the time State assignees spend on work described in the Accomplishment Plan.

PLANNED ACCOMPLISHMENTS SCHEDULE

1. TYPE OF PLAN	2. PROGRAM SUB-ELEMENT TITLE	3. SUB-ELEMENT NO.	4. SHEET NO.
☐ a. SUB-ELEMENT ☐ b. PART SUB-ELEMENT ☒ c. GEOGRAPHICAL AREA	TECHNICAL SUPPORT & EVALUATION	2A5137	1 of 2
	5. GEOGRAPHICAL AREA TITLE: Region VIII	6. GEOGRAPHICAL AREA CODE	7. PRIORITY

8. CODE	9. NO.	10. SCHEDULE DATE OF COMPLETION	11. PLANNED ACCOMPLISHMENTS
			State of Colorado
	1	2/15/73	Recommendation on approval for emergency episode control plans for priority I regions
	2	3/15/73	Recommendation on approval for transportation control plan for Denver to obtain CO and H_c standards
	3	11/30/73	Recommendation on approval for SIP for secondary particulate standard
	4	1/30/74	Recommendation on approval for transportation control regulations for Denver
	5		Promulgate (if required) part or all of secondary NAAQS SIP
			State of Montana
	6	7/31/72	Promulgate (if required) portions of primary NAAQS SIP
	7	2/15/73	Recommendation on approval for emergency episode control plans for priority I regions

12. FY 1973		13. FY 1974		14. PREPARED BY AND DATE	15. REVIEW BY AND DATE
a. $1000	b. MAN-YEARS	a. $1000	b. MAN-YEARS	Norman A. Huey - 6-2-72	
				16. APPROVED FOR RPIO	

EPA Form 3500-4 (Rev. 4-72)

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☐ a. SUB-ELEMENT ☐ b. PART SUB-ELEMENT ☐ c. GEOGRAPHICAL AREA	TECHNICAL SUPPORT & EVALUATION	2A5137	2 of 2
	5. GEOGRAPHICAL AREA TITLE Region VIII	6. GEOGRAPHICAL AREA CODE	7. PRIORITY

8. CODE	9. NO.	10. SCHEDULE DATE OF COMPLETION	11. PLANNED ACCOMPLISHMENTS
			State of Utah
	8	7/31/72	Promulgate (if required) portions of primary NAAQS SIP
	9	2/15/73	Recommendation on approval for emergency episode control plans for priority I regions
	10	3/15/73	Recommendation on approval for transportation control plan for Salt Lake City to obtain CO standards
	11	12/30/73	Recommendation on approval for transportation control regulations for Salt Lake City

12. FY 1973		13. FY 1974		14. PREPARED BY AND DATE	15. REVIEW BY AND DATE
a. $1000	b. MAN-YEARS	a. $1000	b. MAN-YEARS	Norman A. Huey - 6-2-72	
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1. TYPE OF PLAN ☐ a. SUB-ELEMENT ☐ b. PART SUB-ELEMENT ☐ c. GEOGRAPHICAL AREA	2. PROGRAM SUB-ELEMENT TITLE Completion of SIP Approvals and Compliance Schedules 5. GEOGRAPHICAL AREA TITLE	3. SUB-ELEMENT NO. 2A4136 6. GEOGRAPHICAL AREA CODE	4. SHEET NO. 7. PRIORITY

8. CODE	9. NO.	10. SCHEDULE DATE OF COMPLETION	11. PLANNED ACCOMPLISHMENTS
			State of Colorado
	1	Ongoing	2 State Assignees working with State agency
			State of Montana
	2	Ongoing	3 State Assignees working with State agency
			State of Utah
	3	Ongoing	2 State Assignees working with State agency

12. FY 1973		13. FY 1974		14. PREPARED BY AND DATE	15. REVIEW BY AND DATE
a. $1000	b. MAN-YEARS	a. $1000	b. MAN-YEARS	Norman A. Huey - 6-2-72	
				16. APPROVED FOR RPIO	

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1. Type of Plan a. ☐ Sub-Element b. ☐ Part. Sub-Elem. c. ☐ Geo. Area			2. Program Sub-Element Title: Completion of SIP Approvals and Compliance Schedules	3. Sub-Element No. 3A1121	4. Sheet No.
			5. Geographical Area Title	6. Geo. Area Code	7. Priority
8. Code	9. No	10. Sched Date of Comp.	11. PLANNED ACCOMPLISHMENTS		
			States of Colorado, Montana and Utah		
	1	7/31/72	Receive existing compliance schedules		
	2	8/31/72	Formal Conference with State agencies to discuss form and content of compliance schedules		
	3	2/15/73	Approve/disapprove the submitted existing compliance schedules		
	4		Compliance schedules received by RO		
	5	4/15/73	Compliance schedules approved/disapproved		
	6	Continuous	Assist state agencies in making necessary changes in compliance schedule		

12. FY 1973		13. FY 1974		14. Prepared by & Date	15. Reviewed by & Date	16. Approved for RPIO
a.	b.	a.	b.	Norman A. Huey-6-2-72		

Planned Accomplishments